

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
CIVIL NO. 3:11-CV-129**

**DENISE DIANE CRAWFORD,
individually and on behalf of all persons
similarly situated,**

Plaintiff,

v.

**ZENTA MORTGAGE SERVICES LLC,
ACCENTURE LLP, and ACCENTURE
CREDIT SERVICES LLC,**

Defendants.

**PLAINTIFF'S UNOPPOSED MOTION
FOR PRELIMINARY APPROVAL OF THE SETTLEMENT AGREEMENT**

Plaintiff respectfully moves this Court for an Order:

1. Granting preliminary approval of the Parties' Settlement Agreement, a true and correct copy of which is attached as Exhibit 1 to this Motion;
2. Preliminarily certifying the Settlement Class as a Rule 23 class and certifying the Settlement Class under 29 U.S.C. § 216(b) for purposes of settlement on behalf of "all individuals who worked as mortgage loan underwriters in the State of North Carolina at Zenta Mortgage Services, LLC, Accenture LLP and/or Accenture Credit Services LLC during the period from March 14, 2008 through May 1, 2012" (the "Settlement Class");
3. Appointing Denise Diane Crawford as the Representative of the Settlement Class;
4. Appointing Berger & Montague, P.C. as Class Counsel for the Settlement Class;
5. Appointing Heffler, Radetich & Saitta LLP as Claims Administrator and preliminarily approving the costs of claims administration;

6. Approving the Class Notice and Claim Form, true and correct copies of which are attached as Exhibits A and B, respectively, to the Settlement Agreement; and

7. Approving the proposed schedule and procedure for completing the final approval process as set forth in the Parties' Settlement Agreement.

This Motion is based on the accompanying Memorandum of Law, the Declaration of Shanon J. Carson in Support of the Plaintiff's Unopposed Motion for Preliminary Approval, and all other records, pleadings and papers on file in this action. Pursuant to the terms of the Settlement Agreement, Defendants do not oppose this Motion.

A proposed Order is submitted for the Court's consideration.

Dated: August 13, 2012

Respectfully submitted,

s/ Shanon J. Carson
Shanon J. Carson (PA 85957)
Sarah R. Schalman-Bergen (PA 206211)
BERGER & MONTAGUE, P.C.
1622 Locust Street
Philadelphia, PA 19103
Telephone: (215) 875-4656
Facsimile: (215) 875-4604
scarson@bm.net
sschalman-bergen@bm.net

Attorneys for Plaintiff and the Class

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served upon counsel for Defendants through the Court's ECF system this 13th day of August, 2012, addressed as follows:

David J. Rowland
Rebecca Pratt Bromet
James Beyer
Jeremy Wayne Stewart
SEYFARTH SHAW LLP
drowland@seyfarth.com
rbromet@seyfarth.com
jrbeyer@seyfarth.com
jwstewart@seyfarth.com

David C. Wright, III
Douglas M. Jarrell
ROBINSON, BRADSHAW & HINSON, P.A.
dwright@rbh.com
djarrell@rbh.com

s/ Shanon J. Carson
Shanon J. Carson